

# **EXHIBIT A**



Kate Tsyvkin &lt;katetsyvkin@gmail.com&gt;

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**Fwd: Emailing - PROFESSOR JEFFREY SEDLIK\_CV\_160428.pdf**

GLEN CRAIG &lt;GLEN CRAIG@rcn.com&gt;

To: Kate Tsyvkin &lt;KT@liebowitzlawfirm.com&gt;, Richard Liebowitz &lt;RL@liebowitzlawfirm.com&gt;

Tue, Sep 20, 2016 at 12:56 PM

HI KATIE,

THIS IS THE EXPERT WE SPOKE OF  
GLEN

Begin forwarded message:

**From:** GLEN CRAIG <GLEN CRAIG@RCN.COM>  
**Subject:** Fwd: Emailing - PROFESSOR JEFFREY SEDLIK\_CV\_160428.pdf  
**Date:** September 19, 2016 at 6:00:19 PM EDT  
**To:** Glen Craig <glencraig@rcn.com>

Begin forwarded message:

**From:** "Jeff Sedlik" <jeffsedlik@gmail.com>  
**Subject:** FW: Emailing - PROFESSOR JEFFREY SEDLIK\_CV\_160428.pdf  
**Date:** September 19, 2016 at 5:29:37 PM EDT  
**To:** <glencraig@rcn.com>  
**Reply-To:** <jeffsedlik@gmail.com>

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**PROFESSOR JEFFREY SEDLIK\_CV\_160428.pdf**  
434K



Kate Tsyvkin &lt;katetsyvkin@gmail.com&gt;

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**Fwd: sedlik****GLEN CRAIG** <GLENCRAIG@rcn.com>

Thu, Oct 19, 2017 at 6:01 PM

To: Richard Liebowitz &lt;RL@liebowitzlawfirm.com&gt;, Kate Tsyvkin &lt;KT@liebowitzlawfirm.com&gt;, "James H. Freeman" &lt;JF@liebowitzlawfirm.com&gt;

Begin forwarded message:

**From:** "Jeff Sedlik" <[jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)>  
**Subject: FW: sedlik**  
**Date:** September 19, 2016 at 5:29:19 PM EDT  
**To:** <[glenraig@rcn.com](mailto:glenraig@rcn.com)>  
**Reply-To:** <[jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)>

Hi Glen, good speaking with you.

Contact attorney:

Jan Berlage

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*Jan I. Berlage*  
Direct: [410-752-1261](tel:410-752-1261)  
Mobile: [443-857-7789](tel:443-857-7789)  
[JBerlage@ghdsllp.com](mailto:JBerlage@ghdsllp.com)

He has a speech impediment.

Jeff Sedlik



Kate Tsyvkin &lt;katetsyvkin@gmail.com&gt;

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**Fwd: PHOME CALL FOR FRIDAY PM GLEN CRAIG****GLEN CRAIG** <GLENCRAG@rcn.com>

Thu, Oct 19, 2017 at 6:03 PM

To: "James H. Freeman" &lt;JF@liebowitzlawfirm.com&gt;, Kate Tsyvkin &lt;KT@liebowitzlawfirm.com&gt;, Richard Liebowitz &lt;RL@liebowitzlawfirm.com&gt;

Begin forwarded message:

**From:** "Jeff Sedlik" <[jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)>  
**Subject: RE: PHOME CALL FOR FRIDAY PM GLEN CRAIG**  
**Date:** September 22, 2016 at 7:01:04 PM EDT  
**To:** "GLEN CRAIG" <[GLENCRAG@RCN.COM](mailto:GLENCRAG@RCN.COM)>  
**Reply-To:** <[jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)>

yes

**From:** GLEN CRAIG [<mailto:GLENCRAG@RCN.COM>]  
**Sent:** Thursday, September 22, 2016 4:00 PM  
**To:** [jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)  
**Subject:** PHOME CALL FOR FRIDAY PM GLEN CRAIG

Hi Jeff,

I spoke with Richard today may we do this on saturday around 3 30 pm our time ?

He is tied up on Friday pm

Please let me know if this works

Thanks

Glen

Begin forwarded message:

**From:** GLEN CRAIG <[GLENCRAG@RCN.COM](mailto:GLENCRAG@RCN.COM)>  
**Subject: Fwd:**  
**Date:** September 19, 2016 at 6:04:45 PM EDT  
**To:** Glen Craig <[glenraig@rcn.com](mailto:glenraig@rcn.com)>

Begin forwarded message:

**From:** "Jeff Sedlik" <[jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)>  
**Date:** September 19, 2016 at 5:31:07 PM EDT

**To:** <[glencraig@rcn.com](mailto:glencraig@rcn.com)>  
**Reply-To:** <[jeffsedlik@gmail.com](mailto:jeffsedlik@gmail.com)>

See:  
<http://www.yellowkorner.com/us-en/>

**PROFESSOR JEFFREY SEDLIK**  
**Curriculum Vitae**

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**Contact Information**

Mailing Address	2797 East Foothill Boulevard, Suite 120, Pasadena, California 91107 USA
Telephone	626.808.0000 (LA) 212.447.1255 (NYC) 213.716.6627 (Cell)
Email	<a href="mailto:expert@sedlik.com">expert@sedlik.com</a>

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**About Professor Sedlik**

President & CEO of the PLUS Coalition, the international standards body for the licensing of visual works. Professional photographer, educator, publisher, forensic analyst, graphic designer, product designer, expert witness, fundraiser, negotiator and consultant. Past National President of the Advertising Photographers of America (APA), a leading trade association in the commercial photography industry. Past APA Chief Advisor on Licensing and Copyright. 2005 Photography Industry Leadership Award, International Photography Council. 2006 Photography Person of the Year, Photo Media Magazine. 2007 Industry Leadership Award, Advertising Photographers of America.

Advises clients on industry trends, business practices, copyright and contract issues, digital asset management, asset identification systems, metadata standards, rights languages, valuation of photographs/photography and other visual artworks and related services, licensing, rights of publicity/privacy, social media, investment and acquisition opportunities, strategic partnerships, photographic history, digital and traditional photographic and design techniques and workflows, forensic photographic analysis, graphic design, product design, publishing, and product manufacture. Provides expert witness and consulting services on these and other matters related to photography, advertising, design and the modeling industry. Provides expert testimony on damages and other liability arising from breach of contract, infringement of copyright, trade dress, removal/alteration of copyright management information, DMCA violations, rights of publicity/privacy, loss/damage/theft of artworks, image manipulation and other issues. Provides photogrammetric services and forensic analysis of images and video. Serves as a Professor at the Art Center College of Design. An accomplished and experienced educator, conducts advanced seminars and workshops for professionals, and teaches college-level courses on copyright, licensing, advertising, design and related business practices.

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**Professional Experience**

**PLUS Coalition, Inc.**, 2005 – Present. Serves as President and CEO for the global standards body for the image licensing industries. A non-profit organization, Picture Licensing Universal System (“PLUS”) is dedicated to the development and maintenance of international licensing standards and systems in the photography, illustration, publishing, advertising, graphic design, museum, library and education communities in 120 countries. Directed recruitment of trade organizations and other interested parties worldwide and supervised development and implementation of licensing standards, and development of a global rights registry.

**PLUS Coalition, LTD.**, 2005 – Present. Serves as President, CEO and Director of the London-based subsidiary of the PLUS Coalition, Inc..

**Sedlik Productions/Sedlik Design**, 1986 – Present. Serves as President of a leading commercial photography,

design, and film production company. Also serves as Producer, Director, Photographer, and Director of Photography, creating photography, film and video productions for advertising agencies, graphic design studios, the entertainment industry, and other clients. Operates SedlikStock, a subsidiary dedicated to licensing existing Sedlik images for advertising, editorial and merchandizing usage via affiliates including stock photography agencies and publishers. Maintains relationships with major photography industry manufacturers, testing and demonstrating analog and digital equipment and software. Provides graphic design, advertising design and product design and manufacturing services.

#### **Partial Client List- Sedlik Productions/Sedlik Design**

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**Clients:** 3m; 20th Century Fox; A&E Television Network; ABR Information Services; Alpo; AmSouth Bank; Andazia, Inc; Arista Records; Association of Tennis Professionals; AT&T; Avery Dennison; Bank of America; Barrington Music Products; BBC; Blue Cross; BMG/RCA Records; Bristol Myers Squibb; Buena Vista Pictures; Bureau of Census; CareAmerica; Chesebrough-Ponds; CBS/Sony Music; Cedars Sinai; Century 21; Cherokee; Columbia Pictures; Computer Associates; Concord Records; Conroy's Florist; Direct TV; Disney; Doubleday; Dreyfus; Epson; Essilor; Farmer's Insurance; Federal Express; Fitzgerald-Hartley Co.; Ford; Gannon/Hartley; Geffen Records; Georgia Pacific; Great Performances; Great Western Bank; GRP Records; GTE; Guinness Museum; Hanna-Barbera; Harcourt Publishers; Hopper Papers; Ikea; Infiniti Automobiles; Island Records; Janssen Pharmaceuticals; JVC Musical Industries; Kraft Food Products; Korg, Inc.; LaFace Records; Laura Ashley; Levi Strauss; Mark Taper Forum; Missouri Historical Society; MCA Records; MCA International; Metro Goldwyn Mayer; Microsoft; Motion Picture & TV Fund; Movieland; MSN; MTM Entertainment; MTV Networks; Navisite; NBC Television; Neenah Paper; Nestle'; New World Pictures; Nike; Pacific Bell; Palm Press; Paramount Pictures; Phillip Morris; Polygram Records; Pomegranate Books; Potlatch; Prentice-Hall; San Diego Zoo; Schering Plough; SBC; Signature Eyewear; Smithsonian Institution; Sony Inc.; Southern Natural Gas; Spanish Tourism Office; Sugar Hill Records; Taco Bell; Telarc International; Toyota; Turner Broadcasting; U. C. Press; United Airlines; United Way; Universal Studios; VH-1; Warner Brothers Records; Web TV; Windham Hill Records; Word Records; World Savings; Yamaha; Zellerbach; Ziff-Davis; Zildjian

**Advertising Agencies & Design Firms:** Alan Sekuler & Associates; Asher Gould; BBDO; Bozell, Brierley & Partners; Brooks-Gruman Advertising; Campbell, Mithun, Esty; Cline, Davis, & Mann; Cross & Associates Design; Dailey & Associates; Davis, Elen; Daymark; DDB Needham, Worldwide; Deutsch; Douglas Oliver Design; DVC Marketing; DZN; The Design Group; East/West Network; Fitzgerald & Associates; FKQ Advertising; FP Horak Advertising; Foote, Cone, & Belding; GBF Ayer; Goodby Silverstein; Grey Advertising; Hill & Knowlton; Huerta Design; Ikkanda Design; Interbrand; J. Walter Thompson; Kang & Lee; Kaufman/Stewart; Ketchum Advertising; Klemtnner Advertising; Kovel Kresser; Kuester Group; Lehman Millet, Inc; Lintas Campbell Ewald; Mangos; Mediatrix; Melia Design Group; Ogilvy & Mather; OZ Advertising; Phillips Ramsey; Poppe-Tyson; Potter Katz & Partners; John Ryan Company; Saatchi & Saatchi; Seineger Advertising; Slaughter Hanson; SmithKlein Beecham; Strike Group; Team One Advertising; Team Creatif; Torre Lazur; Tracy-Locke; Tribe Design; Vrontikis Design; White Rhino Advertising; Young & Rubicam

**Editorial:** American Film; Arts & Entertainment; CD Review; Cosmopolitan; Details; Downbeat; Elle; Entertainment Weekly; Glamour; GuestInformant; Imperial Press; In Focus; Interiors & Sources; Jazziz; Jazz Times; Life; Los Angeles Magazine; Los Angeles Times Magazine; Mirabella; Music Connection; Newsweek; Photo District News; People; Premiere; Pulse; Q Magazine; Rolling Stone; Select; Spin; Time-Life

#### **Other Professional Experience**

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**Linked Content Coalition, (LCC) 2013 – Present.** Serves as a Founding Director of the Linked Content Coalition (LCC), a UK-based, not-for-profit global consortium of standards bodies and registries. LCC members are

organizations engaged in creating and managing data standards associated with content of one or more types, particularly for identifiers, metadata and messaging. The purpose of the LCC is to facilitate and expand the legitimate use of content in the digital network through the effective use of interoperable identifiers and metadata.

**American Society of Collective Rights Licensing (ASCRL)**, 2014 – Present. Serves as Founding Director of ASCRL, a non-profit collecting society engaged in collecting and distributing foreign and domestic royalties to authors and copyright owners in visual works in the United States.

**Copyright Alliance (CA)**, 2016 – Present. Serves as Board member on the Copyright Alliance Creators Advisory Board, collaborating with leading organizations and experts in the creative industries on copyright-related issues including education, legislation, advocacy and other efforts.

**Advertising Photographers of America (APA)**. Served as National President , 2000 – 2002. Served as Chief Advisor on Licensing & Copyright, 2002 – 2012. Directed and supervised all operations of the largest trade organization representing advertising photographers, leading more than seventy volunteer board members located in all areas of the country. Advised federal and state legislators, and senior officials at the Small Business Administration and US Copyright Office. Also served on the Board of Directors of the APA Los Angeles Chapter, and on that chapter's Legal and Legislative Committee, Advocacy Committee and Sales Tax Committee.

**Beijing Intellectual Property Expertise Center of Judicature (JZSC)**, 2007 – Present. Advisor to Chinese governmental agency and the People's Court of China on intellectual property issues in China.

**IPTC Photo Metadata Working Group**, 2006 – Present. Active participant in the International Press Telecommunications Council (IPTC) standards body. Member of the IPTC Photo Metadata Working Group, charged with establishing and maintaining standards for embedded metadata in digital photographs. Co-authored the IPTC Photo Metadata White Paper 2007 and the IPTC-PLUS Photo Metadata Toolkit.

**Universal Photographic Digital Imaging Guidelines (UPDIG)**, 2004 – Present. Active participant in working group charged with developing worldwide standards in the commercial application of digital imaging technologies. Participant in Model Release Working Group, charged with developing international standards for model releases and model release workflow.

**Consultant and Expert Witness**, 2000 – Present. Provide consulting services, forensic analysis and expert testimony on legal, business and technical matters related to digital and traditional photography, illustration, marketing and other topics.

**United States Copyright Office**, 2008 – Present. Advises senior staff members on topics including copyright registration, regulatory, re-engineering and professional workflow issues. Alpha test consultant for online electronic copyright registration system.

**Adobe Photographer's Council**, 2004 – 2010. Advised Adobe Systems on matters related to Adobe products and services, including digital photography technologies, stock photography, and industry standards.

**Adobe Pre-release Testing**, 2004 – Present. Provides pre-release testing services to Adobe, both alpha and BETA testing of Adobe products and services.

**Founder, Digital Technology Advisory Council**, 2002. Founded advisory council comprised of high level representatives from each of the leading photography industry manufacturers.

**Advisory Board Member, WorkbookStock**, 2000 – 2006. Served on the advisory board of WorkbookStock, a leading stock photography agency. Consulted on the development of a vendor contract, copyright registration procedures, and web interface.

**Advisory Board Member, Exactly Vertical**, 1998 – 2000. Served on the advisory board of Exactly Vertical, a company offering interactive business management solutions for photographers. Consulted on issues including web interface, software design, copyright registration, merchandizing, stock licensing, photographers' workflows, and branding.

**Other, 1996 – Present:** Numerous additional consulting engagements under NDA, including the identification and analysis of investment opportunities, strategic partnerships, acquisition targets, product development and launch strategies, advisory council recruitment, fundraising, negotiations, mediation and deal brokering.

### **Awards & Recognition**

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**APA Photography Industry Leadership Award**, 2007. Presented by Advertising Photographers of America.

**Photography Person of the Year**, 2006. Presented by Photo Media Magazine.

**ICP Photography Industry Leadership Award**, 2005. Presented by the International Photography Council, a non-governmental organization of the United Nations.

**Mamiya Award of Excellence in Photo Education**, 1999. Recognized as a leading arts educator. Selected from all college-level photography instructors, nationwide.

**The Clio Awards. Silver Clio, Director of Photography, Rich Media Advertising**, 1999;

### **Selected Additional Awards and Recognition**

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Print's Regional Design Annual. Award of Excellence, 1999; Ozzie Awards. Silver Ozzie for Best Photography, 1999; Art Directors Club. Excellence in Photography, 1999; Art Directors Club. Excellence in Photography, 1999; PDN/Nikon Award of Excellence in Self Promotion, 1998; Advertising Photographers of America. Best in Show, 1998; Communication Arts Award of Excellence in Editorial Photography, 1998; The One Show Award for Excellence in Advertising, 1997; Communication Arts Award of Excellence, Unpublished Work, 1997; Communication Arts Award of Excellence in Self Promotion, 1996; Communication Arts Award of Excellence in Advertising Photography, 1994; Communication Arts Award of Excellence, Book Series, 1993; Art Direction Magazine Creativity Award, 1992; Communication Arts Award of Excellence in Editorial Photography, 1992; Communication Arts Award of Excellence in Advertising Photography, 1991; Communication Arts Award of Excellence in Editorial Photography, 1990; Art Direction Magazine. Creativity Award, 1990

### **Selected Articles Authored**

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**ASMP Professional Business Practices in Photography**, 2008. Contributing author.

**United States House Judiciary Committee**. "The Orphan Works Dilemma: Challenges & Recommendations," 2006. Treatise submitted to the House Judiciary Committee by invitation of the General Counsel, in relation to the U.S.

Copyright Office “Report on Orphan Works.”

**Photo District News.** Contributor to Photo District News, the photography industry’s primary trade publication. Authored the “Ask The Expert” column, writing on subjects of business management, licensing, copyright, and creativity.

**In Focus.** Contributor to In Focus Magazine, the magazine of the Advertising Photographers of America, writing on subjects including business management, industry trends, protecting the value of photography, licensing, copyright, creativity.

**Wraparound.** Founder and regular contributor to Wraparound Magazine, writing on legal and business topics.

**APA/LA NewsMagazine.** Contributor to the news magazine published by the Advertising Photographers of America, Los Angeles Chapter.

**Photo Media.** “Get Down to Business” Fall, 2000

**IPTC Photo Metadata White Paper 2007.** Co-author.

## **Professional Societies**

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**PLUS Coalition, Inc. (PLUS)**

**Advertising Photographers of America (APA)**

**American Institute of Graphic Arts (AIGA)**

**American Society of Media Photographers (ASMP)**

**American Society of Picture Professionals (ASPP)**

**Pro Imaging (PI)**

**Photography Instructors Education Association (PIEA)**

## **Selected Speaking Engagements**

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**Miscellaneous Events and Engagements**, 1977 – Present. Invited speaker/panelist at the industry’s major trade shows, speaking on topics including copyright, licensing, advertising, branding, design, publishing, product development, self promotion, stock image licensing and technical issues. Lectured on photography at LAUSD Community Adult School. Speaks before groups of photographers and creatives worldwide. Wrote and produced the APA “Real World” seminar series on topics ranging from estimating, to licensing, to producing. Participated in the development of Digital Imaging for Photographers, a leading seminar series dedicated to cutting-edge digital techniques and equipment. Speaker at the “PDN on the Road” seminar series, on copyright, licensing and stock photography. Speaker at the ASMP Strictly Business Workshops, ASMP Copyright Symposiums, Copyright & Technology Conferences, Digital Asset Management Conferences, World Copyright Summits, Copyright Office

Roundtables and many other events.

**United States House Judiciary Subcommittee on the Courts, Intellectual Property and the Internet**, 2014. Testimony at hearing entitled "Preservation and Reuse of Copyrighted Works."

**United States Copyright Office**, 2014. Orphan Works & Mass Digitization Round Table.

**University of California Los Angeles**, 2014. US Copyright Office Recordation Reengineering Roundtable.

**World Creators' Summit**, 2013. Orphan Works. Balancing Access and Creator's Rights.

**IPTC Metadata Conference**, 2013. Metadata Technology. What the Future Might Bring.

**California Visual Resources Association Conference**, 2014. Image Rights: Leveraging Rights Metadata to Maximize Access and Minimize Liability.

**National Association of Recording Merchandisers (NARM) Conference, 2013**. Managing Photographic and Video Archival Assets.

**Advertising Photographers of America (APA)**, 2013. Social Media, the PLUS system, and Strategic Marketing in the Internet Age

**ICON LA Illustration Conference**, 2010. Illustrators and Copyright

**Picture Archive Council of America, International Conference**, 2004. Image Licensing in the 21<sup>st</sup> Century

**Createasphere/ EXPLORE Entertainment Technology Exposition**, 2010. Effective Digital Asset Management Workflows

**American Society of Media Photographers**, 2010. Copyright and the New Economy: Issues and Trends Facing Visual Artists

**Photo Plus Expo**, 2009. Strategic Estimating

**Museum Computer Network**, 2009. Copyright in the Cultural Heritage Sector

**Smithsonian Institute**, 2009. Beyond the Copyright Field: Current Trends in Rights and Licensing Metadata

**Photo Marketing Association**, 2008. Breakthroughs in Photo Archiving using Metadata

**Picture Archive Council of America (PACA), International Conference**, 2008. Copyright in the stock image industry

**Henry Stewart DAM Symposium**, 2008. Rights, Images and PLUS: Challenges & Solutions

**IDEAlliance XMP Open Content Metadata Summit**, 2008. Leveraging XMP to Advance Industry Standards

**Picture Archive Council of America (PACA)**, 2007. Searching for a Common Ground: Setting Standards in a Time of Change

**Library of Congress**, 2007. Image Preservation with PLUS

**Japan Photographer's Union**, 2007. Photography & Copyright: International Issues

**Digital Library Federation, Fall Forum**, 2007. Facilitating the Fair Licensing of Digital Images, and Determining Copyright

**Museum Computer Network, Annual Conference**, 2007. Museums and Intellectual Property: Challenges and Solutions

**IDEAlliance XMP Open Content Metadata Summit**, 2007. Advanced Photography Metadata Workflow Strategies

**American Society of Picture Professionals, Education Conference**, 2006. Strategic Licensing: The Art & Science of Maximizing Your Profits

**International Press Telecommunications Council (IPTC) Conference**, 2006. PLUS and IPTC, a Collaboration

**Coordination of European Picture Agencies Press Congress (CEPIC) Conference**, 2006. Implementing International Standards in Image Licensing

**Oxford University**, 2006. Digital Object Identifiers and Copyright

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### **Foundation, Community Service and Charitable Work**

**Warren King Foundation**, President, 2000–2002. Created foundation providing endowed photography scholarships to promising photography students. Produced a fundraising event attended by photographers, educators, government officials and media. Lobbied Los Angeles Unified School District to re-launch abandoned arts education programs in local schools. Arranged for an arts teacher to receive a lifetime achievement award at the Kennedy Center.

**Other Community Service and Charitable Work.** Conduct visiting lectures on the art and history of photography for elementary school students in the Los Angeles Unified and Pasadena Unified School Districts. Judge photography exhibitions at the high school, college, and amateur, and professional levels. Photograph pro-bono or reduced-fee public service campaigns for charitable organizations such as the LA Times “Reading by Nine” program, Jewish Family Services, Motion Picture and Television Fund, United Way, and others. Volunteered time to leadership in the Boy Scouts and public schools. Donated original photographic prints to each of the Focus on Aids annual fundraising auctions 1987-2003, Woodcraft Rangers, Pediatric Aids Foundation and other vital charitable organizations.

**Boy Scouts of America**, Eagle Scout, 1972-1977.

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### **Academic**

**Continuing Education**, 1986-Present. Attends workshops and seminars on business, legal and technical issues affecting photographers, illustrators, designers and other visual creators, with an emphasis on intellectual property, business management, stock photography, and digital technology courses. Consults with manufacturers and distributors in testing new equipment to stay abreast of the latest developments in digital imaging, design and

manufacturing technologies.

**Brooks Institute**, 2008, MFA, HC.

**Art Center College of Design**, 1986, BFA.

**University of California at Santa Barbara**, 1980-1983, Liberal Studies major with emphasis in Art, Art History, Economics, Business Management.